

UNITED STATES DISTRICT COURT  
FOR THE  
EASTERN DISTRICT OF PENNSYLVANIA

JENNIFER MCGHEE, JENNIFER TOMCZAK, )  
Plaintiff(s), )  
v. ) Civil Action No. 16-3542  
A&M (2015), LLC, fka YM, LLC USA dba ANNIE )  
SEZ dbh MANDEES; KEN SYRMOULOS )  
INDIVIDUALLY AND IN HIS OFFICIAL CAPACITY )  
AS VICE PRESIDENT OF SALES AND OPERATIONS )  
FOR A&M (2015), LLC, )  
Defendant(s). )

**STIPULATION FOR EXTENSION OF  
TIME TO ANSWER OR OTHERWISE RESPOND**

Plaintiffs, by and through their undersigned attorneys, and Defendants, by and through their undersigned attorneys, hereby stipulate and agree to extend the time for Defendants to respond to Plaintiffs' complaint, and for the reasons set forth below respectfully request that the Court enter an order in the form submitted herewith:

1. On August 15, 2016, Plaintiffs filed their complaint.
2. Defendants were served with the summons and complaint on September 8, 2016.
3. The parties have not previously requested an extension of Defendants' responsive pleading deadline.

WHEREFORE, the parties respectfully request that the Court enter an order in the form attached hereto extending Defendants' responsive pleading deadline until October 14, 2016.

Dated: September 28, 2016

**PORZIO, BROMBERG & NEWMAN, P.C.**

By: s/Diane Fleming Averell  
Diane Fleming Averell, Esq.

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USA dba ANNIE SEZ dbh MANDEES; KEN SYRMPoulos  
INDIVIDUALLY AND IN HIS OFFICIAL CAPACITY AS VICE  
PRESIDENT OF SALES AND OPERATIONS FOR A&M  
(2015), LLC*

\_\_\_\_\_, 2016

**KIMMEL & SILVERMAN, PC**

By: Craig Thor Kimmel, Esq.  
Craig Thor Kimmel, Esq.

30 East Butler Pike  
Ambler, PA 19002

*Attorneys for Plaintiffs Jennifer McGhee and Jennifer  
Tomczak*

Dated: September \_\_, 2016

PORZIO, BROMBERG & NEWMAN, P.C.

By:

Diane Fleming Averell, Esq.

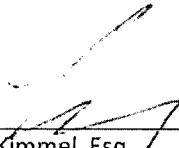
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(2015), LLC*

9-28-16, 2016

KIMMEL & SILVERMAN, PC

By:

  
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*Attorneys for Plaintiffs Jennifer McGhee and Jennifer  
Tomczak*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 28<sup>th</sup> day of September, 2016, the foregoing Stipulation For Extension Of Time To Answer Or Otherwise Respond was electronically filed using the CM/ECF System, and notice was given to all parties using this system.

September 28, 2016

**PORZIO, BROMBERG & NEWMAN, P.C.**

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IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JENNIFER MCGHEE, JENNIFER TOMCZAK, )  
Plaintiff(s), )  
v. ) CIVIL ACTION NO.  
A&M (2015), LLC, fka YM, LLC USA dba ANNIE ) 16-3542  
SEZ dbh MANDEES; KEN SYRMOULOS )  
INDIVIDUALLY AND IN HIS OFFICIAL CAPACITY )  
AS VICE PRESIDENT OF SALES AND OPERATIONS )  
FOR A&M (2015), LLC, )  
Defendant(s). )

**[PROPOSED] ORDER**

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2016, upon consideration of the parties' Stipulation for Extension of Time to Answer or Otherwise Respond, it is hereby ORDERED that Defendants shall file an answer or otherwise respond to Plaintiffs' complaint on or before October 14, 2016.

Chief Judge Petrese B. Tucker